

EXHIBIT A

1. Characteristics of Mackie Wolf Zientz & Mann, PC

Any evidence concerning the size, quality, number of attorneys, location, business address, areas of practice, or any other characteristics of the law firm of Mackie Wolf Zientz & Mann, PC. Such is irrelevant and only an attempt to prejudice the jury. FED. R. EVID. 401-403.

2. Defense Attorneys

Any statement, reference, comment or question pertaining to the relationship between Defendant and the attorneys representing Defendant in this cause of action.

3. Claims & Lawsuits

Evidence, statements, or questions regarding other claims or lawsuits brought against Defendant, its attorneys, or its witnesses. FED. R. EVID. 401-403.

4. Remarks of Counsel

Statements or questions made by counsel at any deposition or other pretrial proceeding, other than questions by counsel to a deponent during a deposition.

5. Motion in Limine

Statements or questions regarding Defendant's filing of this motion in limine, the reason for the filing of the motion in limine, the Court's rulings on the motion in limine, and the effect of the Court's rulings.

6. Failure to Call Equally Available Witness

Any comments or reference that Defendant has not called to testify any witness equally available to both Defendants and Plaintiff in this cause. In this connection, Defendant moves that Plaintiff's counsel further be instructed not to tender, read from or refer to any ex parte statement or report, not previously admitted in evidence by the Court, of any person not then and there present in Court to testify and be cross-examined by counsel for Defendant, and that Plaintiff's counsel be instructed not to suggest to the jury, by argument or otherwise, what would have been the testimony of any witness not actually called. FED. R. EVID. 403, 801-804.

7. Absent Witnesses

Evidence, statements, or questions regarding the probable testimony, observations, or opinions of a witness who is absent, unavailable, or not called to testify at trial, as well as any

statements or questions regarding the reason why any witness or party is absent, unavailable, or not called to testify at trial.

8. Requests for Documents

Requests for any documents, photographs, or other materials contained in Defendant's or its attorneys' files.

9. Agreements & Stipulations

Plaintiff's requests for agreements, stipulations, or understandings in the presence of the jury: requests for agreements, stipulations, or understandings from Defendant or its attorneys regarding any disputed fact issue, any disputed legal issue, or the admissibility of any evidence.

10. Texts, Treaties & Articles

Evidence, statements, or questions regarding statements in any textbook, treatise, or article until said textbook, treatise, or article has been properly identified and the proper predicate for admissibility of such evidence established. FED. R. EVID. 803(18).

11. Charts & Summaries

Plaintiff's offering of charts, summaries or calculations relating to damages that are not supported by the proper predicate and where the underlying records have not been made available to Defendant for inspection. FED. R. EVID. 1006.

12. Business Records

Plaintiff's offering of business records that do not comply with Federal Rules of Evidence or are otherwise not properly authenticated.

13. Effect of Answers to Charge

Evidence, statements, or questions that would inform the jury of the effect of their answers to the jury charge.

14. Objections to Discovery

Evidence, statements, or questions regarding the existence or nature of Defendant's objections to Plaintiff's discovery requests or Defendant's refusal to respond to discovery requests to which such objections were made.

15. Opinions as to the Truth or Falsity of Testimony of Others

Eliciting any statements or opinions from any witness or expert witness as to the truth or falsity of the testimony of any other witness or person. Such questioning improperly invades the province of the jury.

16. Attorney/Client Privileges

Communications between Defendant and its attorneys: evidence, statements, or questions regarding communications between Defendant and its attorneys. Such are privileged.

17. Settlement Negotiations

Attempts to compromise or settle the case: evidence, statements, or questions regarding any informal negotiations or more formal mediations involving attempts to compromise or settle the case, including but not limited to, whether the parties actually engaged in such negotiations and mediations, and the amounts offered and/or rejected by any party in such negotiations or mediations. Such are irrelevant. FED. R. EVID. 408.

18. Testimony in Other Suits

Evidence, statements, or questions regarding the deposition or trial testimony in any other suit of any of Defendants' agents, employees, attorneys, or witnesses.

19. Payment of Attorney Fees and Litigation Costs

Statements or questions regarding the fact that Plaintiff may have to pay attorney fees or expenses out of any potential recovery from Defendant. Any mention of or reference to costs or expenses incurred by Plaintiff in connection with bringing and prosecuting this lawsuit. FED. R. EVID. 401-403.

20. Income Tax

Any evidence that any recovery by Plaintiff may be subject to federal income tax or any other form of taxation.

21. Pre-Trial Rulings

Evidence, statements, or questions regarding any pretrial rulings made by this Court, including, but not limited to, any pretrial rulings regarding discovery disputes and motions for sanctions.

22. Untimely Disclosed Expert Witnesses

Testimony by any expert witness not timely or properly identified by Plaintiff in response to discovery requests or disclosure requirements.

23. Unqualified Experts

Mental impressions and opinions held by Plaintiff's expert witnesses who are not qualified: evidence, statements, or questions regarding the mental impressions or opinions held

by an expert witness who has not been qualified by knowledge, skill, experience, training, or education, to testify thereon. FED. R. EVID. 702, 703.

24. Undisclosed Mental Impressions & Opinions

Undisclosed mental impressions and opinions held by, and facts made known to, any of Plaintiff's expert witness: evidence, statements, or questions regarding mental impressions and opinions held by, or facts made known to, Plaintiff's expert witness that were not timely or properly disclosed to Defendant in response to discovery requests.

25. Deposition Testimony

Reading of, or reference to, deposition testimony that contains objections previously sustained by the Court or that contains objections not yet ruled upon the Court unless and until same have been ruled on by the Court.

26. Demonstrative Aids

Plaintiffs' requests for any use of Defendants' demonstrative aids.

27. Financial Status

Any evidence regarding the Defendant's financial status; or regarding the assets, property, liabilities or wealth of the Defendant for the reason that such collateral financial matters are not relevant to any material issue which pertains to the Defendant's conduct in this lawsuit. FED. R. EVID. 401-403.

28. Hearsay Statements

Any mention or statement to the jury regarding what Plaintiff or its attorneys have been told by any person regarding the events from which this litigation arises. In addition, any mention or statement to the jury of the probable testimony of a witness who is absent, unavailable or not called to testify in this cause. Such matters are clearly hearsay and inadmissible. FED. R. EVID. 801-804.

29. Claims of Privilege

From referencing, inquiring, commenting, or questioning a witness regarding the fact that Defendant has claimed a privilege. FED. R. EVID. 513(a) and (b).

30. Comparing Testimony of Witness

From inquiring on cross-examination whether a witness has heard, knows, or has heard, that another witness has testified in a certain manner for the reason such is improper cross-examination, is hearsay and in effect, constitutes testimony by an attorney, creating undue bias, prejudice and confusion to the jury. FED. R. EVID. 401-403.

31. Reference to Disposed Claims

From presenting any testimony or evidence regarding any claims other than the live claims at the time of trial.

32. Predatory Lending Assertions

Any references or assertions that the Defendant and/or the original lender engage(d) in “predatory lending,” or any similar statements suggesting that the Defendant takes unfair advantage of their customers.

33. Mortgage Industry

Any negative references to the mortgage industry generally not supported by admissible evidence or relevance.

34. Defendant’s Reputation

Any reference, suggestion or statement suggesting that the Defendant is a bad corporate citizen or generally has a bad reputation.

35. Industry Comparison

Any comparison of the Defendant or its conduct to any other company or entity or the conduct of any such other company or entity.